Index Sheet

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School Name: PIEDMONT COMMUNITY COLLEGE

Subfolder: Program Review/FPRD

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Rec Date:

Org Date: 03/05/2013

School Year: 2012

ACN:

PRCN: 20120427838

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Accounting Document – Prior Year Monetary Recovery (AD-PYMR)

Institution: Piedmont Community College

City, State: Roxboro

PRCN: 220427838

TIN: 560990351

DUNS: 072006315

Reviewer: Lisa Lancaster **Region:** Atlanta **Date:** March 5, 2013

Section A - Use if no adjustments are being made in COD

Programs	Type	Amount	Funding Code	Object Class
Federal Pell Grant (Closed AY)	Principal	$602,093	3220RNOYR	69017
	Interest	$ 7,460	1435RNOYR	64020
ACG	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
National SMART	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
FSEOG (No FISAP Corrections)	Principal	$ 4,258	3220RNOYR	69017
	Interest	$ 48	1435RNOYR	64020
FWS (No FISAP Corrections)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
Direct Loan and Direct Loan EAL	Principal		4253XNOYR	53020 or 53010
	Interest	$ 2,721	4253XNOYR	53040
FFEL and FFEL EAL	Interest/ SA/EAL		4251XNOYR	53020
Federal Perkins	Principal		2915RNOYR	53054

Section B: Use if the Institution is instructed to make adjustments in COD

Add rows if necessary			Amount			G5 Program Award # *
Pell, ACG, SMART, TEACH	Program / Award Year	Principal		3875FNOYR	69020	
	Program / Award Year	Imputed Interest		1435RNOYR	64020	
Direct Loan (do not use for estimated loss)	Award Year	Principal		3875FNOYR	69020	
	Award Year	Imputed Interest		4253XNOYR	53040	

Comments:

* G5 Award # (P063P104306, first 5 digits = program, next 2 digits = award year, next 4 digits = code unique to school). Note: It is important that the year in the G5 award number correspond to the award year for which any adjustments are being made, or for which the balance has been incurred (in the case of an unsubstantiated cash or negative cash balance). If the reviewer is unsure after looking in G5, contact Susan Lewey for Pell or DL, or Tremia Haythe for FWS or FSEOG.

Example of G5 award numbers for a single school for the 2009-2010 award year, Pell vs. DL:

Pell is designated by "P063P" and DL is designed by "P268K"

P063P091445 (Pell 2009-2010 award - Pell uses the final two digits of the leading award year in the award number)

P268K101445 (Direct Loan 2009-2010 award - DL uses the final two digits of the trailing award year in the award number)

Example of G5 award number for FWS and FSEOG

FWS is designated by "P033A" and FSEOG is designated by "P007A"

P033A092121 (FWS 2009-2010 award - FWS uses the final two digits of the leading award year in the award number)

P007A092121 (FSEOG 2009-2010 award - FSEOG uses the final two digits of the leading award year in the award number)

See FPRD Distribution Form for distribution information for this form and related program review documents.

March 5, 2013

Walter Bartlett, PhD.
President
Piedmont Community College
1715 College Drive
Roxboro, NC 27573-1197

UPS Next Day Air
1ZA5467Y0194651534

RE: Final Program Review Report
OPE ID: 00964600
PRCN: 201220427838

Dear Dr. Bartlett:

The U.S. Department of Education's (Department's) School Participation Division – Atlanta issued a program review report on May 29, 2012 covering Piedmont Community College's (PCC's) administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 *et seq.* (Title IV, HEA programs), for the 2010-2011 and 2011-2012 award years. PCC's final response was received on January 24, 2013. A copy of the program review report (Appendix A) and PCC's response is attached (Appendix B). Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by PCC upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Purpose:

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, (3) notify the institution of its right to appeal, and (4) to close the review.

The total liabilities due from the institution from this program review are $616,580.00. This FPRD contains detailed information about the liability determination for Finding 1.

Protection of Personally Identifiable Information (PII):

Personally Identifiable Information (PII) is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the report do not contain any student PII. Instead, each finding references students by the Appendices attached to this report.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the findings identified from the May 29, 2012 program review report. If PCC wishes to appeal to the Secretary for a review of monetary liabilities established by the FPRD, the institution must file a written request for an administrative hearing. The Department must receive the request no later than 45 days from the date of this FPRD. An original and four copies of the information PCC submits must be attached to the request. The request for an appeal must be sent to:

Ms. Mary E. Gust, Director
Administrative Actions and Appeals Service Group
U.S. Department of Education
Federal Student Aid/PC
830 First Street, NE - UCP3, Room 84F2
Washington, DC 20002-8019

PCC's appeal request must:

(1) indicate the findings, issues and facts being disputed;
(2) state the institution's position, together with pertinent facts and reasons supporting its position;
(3) include all documentation it believes the Department should consider in support of the appeal. Any documents relative to the appeal that include PII data must be redacted except the student's name and last four digits of his / her social security number (please see the attached document, "Protection of Personally Identifiable Information," for instructions on how to mail "hard copy" records containing PII); and,
(4) include a copy of the FPRD. The program review control number (PRCN) must also accompany the request for review.

If the appeal request is complete and timely, the Department will schedule an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The procedures followed with respect to PCC's appeal will be those provided in 34 C.F.R. Part 668, Subpart H. Interest on the appealed liabilities shall continue to accrue at the applicable value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24 (e)(1), (e)(2) and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Lisa Lancaster at (404) 974-9296. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

(b)(6)

Charles Engstrom, Director
School Participation Division-Atlanta

cc: Frances Lunsford, Financial Aid Director
Southern Association of Colleges and Schools (SACS), Commission on Colleges
NC Community College System

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
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Prepared for:
Piedmont Community College

OPE ID: 00964600
PRCN: 201220427838

Prepared by:
U.S. Department of Education
Federal Student Aid
School Participation Division - Atlanta

Final Program Review Determination
March 5, 2013

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Appendices

Appendix A: Program Review Report
Appendix B: Institution's Response to the Program Review Report
Appendix C: Projection Matrix – 2010-2011 Award Year
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Appendix E: EAL Calculation
Appendix F: COF Calculation

A. Institutional Information

Piedmont Community College
1715 College Drive
Roxboro, NC 27573-1197

Type: 2-Year, Public

Highest Level of Offering: Associate's Degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges (SACS)

Current Student Enrollment: 1869 (2011-2012)

% of Students Receiving Title IV: 58% (2011-2012)

Title IV Participation:

Program	2011-2012
Federal Direct Loan (FDL)	$1,282,140
Federal Pell Grant (Pell)	$4,476,262
Federal Supplemental Education Grant (FSEOG)	$ 58,536
Federal Work Study (FWS)	$ 60,000

Default Rate FDL:	2010	0%
(Participation began 7/1/2011)	2009	0%
	2008	0%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Piedmont Community College (PCC) from March 26, 2012 – March 30, 2012. The review was conducted by Lisa Lancaster, Sherry Blackman and Brian Huckaby.

The focus of the review was to determine PCC's compliance with the statutes and regulations as they pertain to the institution's administration of the Title IV programs. The review consisted of, but was not limited to, an examination of PCC's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 36 files was identified for review from the 2010-2011 and 2011-2012 (year to date) award years. The files were selected randomly from a statistical sample of the total population of students receiving Title IV, HEA program funds for each award year. Appendix A of the May 29, 2012 program review report listed the names and social security numbers of the 36 students whose files were examined during the review.

Personally Identifiable Information (PII) is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the report do not contain any student PII. Instead, each finding references students by the Appendices attached to this report.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning PCC's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve PCC of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

C. Findings and Final Determinations

Resolved Findings

PCC has taken the corrective actions necessary to resolve Findings 2 and 3 of the program review report. Therefore, these findings may be considered closed. Finding 1, requiring further action by PCC, is discussed below.

Findings with Final Determinations

The program review report finding requiring further action is summarized below. At the conclusion of the finding is a summary of PCC's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on May 29, 2012 is attached as to this letter as **Appendix A**.

Finding 1: Student Eligibility - Satisfactory Academic Progress Not Clear

Citation Summary: *General Provisions 34 C.F.R. § 668.32 (a) states that a student must be enrolled as a regular student in an eligible program in order to receive Title IV funds. A regular student is someone who is enrolled or accepted for enrollment in an eligible institution for the purpose of obtaining a degree or certificate offered by the school.*

34 C.F.R. §§ 668.16 (e), 668.32 (f) and 668.34 require institutions to establish, publish, and apply reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory academic progress (SAP) in his or her educational program. The Secretary considers an institution's standards to be reasonable if they are at least as strict as that for students who are not receiving Title IV funds, and are applied consistently to all educational programs and to all students within categories (e.g., full-time, part-time, undergraduate and graduate students).

An SAP policy for Title IV purposes must specify the qualitative standard (grade point average or GPA) that a student must have at each evaluation or, if a GPA is not an appropriate qualitative measure, a comparable measure against a norm.

A valid SAP policy must also specify the quantitative standard, or state the minimum amount of work students must complete in each increment. The quantitative component must be no longer than 150% of the published length of a student's educational program. For instance, if the published length of an academic program is 60 credit hours, the maximum period must not exceed 90 (60 × 1.5) attempted credit hours.

If a school's evaluation of a student's SAP makes it clear that he or she cannot mathematically finish his or her educational program within the maximum timeframe, the student becomes ineligible for Title IV aid (unless he or she has extenuating *circumstances and successfully appeals the school's determination of SAP). Each check of academic progress must measure the qualitative and quantitative component.*

The Department published amendments to SAP on October 29, 2010, which became effective on July 1, 2011. Among those changes, one significant modification is that the policy provides that a student's academic progress is evaluated—

- *At the end of each payment period if the educational program is either one academic year in length or shorter than an academic year; or*
- *For all other educational programs, at the end of each payment period <u>or</u> at least annually to correspond with the end of a payment period.*

If a check of SAP shows that a student does not have the required GPA or is not maintaining the required pace, he or she becomes ineligible for Title IV funds unless placed on financial aid warning or probation, as defined:

> ***Financial aid warning:*** *Only schools that check SAP at the end of each payment period may place students on financial aid warning as a consequence of not making satisfactory progress. A school may do this without a student appeal. Warning status lasts for one payment period, during which the student may continue to receive Title IV funds. Students who are still failing to make satisfactory progress after the warning period lose their aid eligibility unless they successfully appeal and are placed on probation.*
>
> ***Financial aid probation:*** *A status a school assigns to a student who is failing to make SAP and who successfully appeals. Eligibility for aid may be reinstated for one payment period only. While a student is on financial aid probation, the institution may require him or her to fulfill specific terms and conditions such as taking a reduced course load or enrolling in specific courses. At the end of one payment period on financial aid probation, the student must meet the institution's SAP standards or meet the requirements of an academic plan developed by the institution in order to qualify for further Title IV funds.*
>
> ***Appeal:*** *A process by which a student who is not meeting SAP standards petitions the school for reconsideration of his eligibility for Title IV funds. A student may appeal that result of not making SAP on the basis of: injury or illness, the death of a relative, or other special circumstances. The appeal must explain why he or she failed to make satisfactory progress <u>and</u> what has changed in his or her situation that will allow him or her to make satisfactory progress at the next evaluation. Students who fail the satisfactory progress check after the end of the probationary payment period may only continue to receive aid if they successfully appeal, the school develops an academic plan, and they will meet the standards by a specific time.*

An institution must also explain how students who are not making SAP can restore their eligibility for Title IV funds. Other than when a student is placed on financial aid warning, probation, or has agreed to an academic plan as outlined above, he or she can regain eligibility only by taking action that brings the student into compliance with the school's standards.

Noncompliance Summary: *The institution's SAP policy for Title IV recipients effective until Fall 2011 was for students to meet the established standard of a 2.0 GPA; a rate of completion of 67%; and a maximum timeframe of 150% of the published length of the student's educational program. The policy also stated that students not meeting the standards were placed on financial aid probation and allowed to receive financial aid for up to two additional terms in an attempt to achieve satisfactory progress. If students did not meet the standards at the end of the probation period, financial aid was suspended until SAP was met.*

Unlike most institutions, PCC has students who enroll in more than one educational program either concurrently or consecutively. The institution's determination of maximum timeframe was not addressed in its published SAP policy for:

- *Students enrolled in multiple programs concurrently; or,*
- *Students enrolled in multiple programs consecutively.*

School officials stated that the determination of SAP for Title IV recipients was based on a student's primary degree. Officials also acknowledged that students who took courses that were not part of their degree program risked getting too close to the 150% maximum timeframe because this inflates the quantitative calculation of SAP.

Despite the explanation of how SAP was determined for Title IV recipients, it appeared that PCC failed to monitor students' progress toward graduation. The below students did not appear to be making SAP as follows:

Student 6: *The student enrolled at PCC for the Fall 2008 semester. By the end of the Spring 2010 semester, the student had completed only 12 of the 28 credits she attempted (including remedial classes). However, there was no record to indicate the student was placed on probation.*

Student 9: *Subsequent to completing two degrees, the student returned to PCC in Fall 2010 to earn a degree in Web Technology. The maximum timeframe for that program is 110 credits. Because she had already attempted 166 credits, she exceeded the number of credits to be eligible for the Title IV aid she received for the 2010-2011 and 2011-2012 award years.*

Student 18: *The student's file reported that she was enrolled for PCC's Associate in Nursing program. The student did not meet the standards for*

SAP at the end of the Spring 2011 term because she did not complete 67% of attempted credits and her GPA dropped to 1.9. The student was placed on academic probation following the Spring 2011 term. However, during the Fall 2011 term the student exceeded 150% of the maximum timeframe for her program. (The maximum timeframe was 109 credits but she attempted 117 credits.) And although the credits exceeded her program of study, PCC disbursed Federal Pell Grant funds for Spring 2012.

Student 19: *As of Spring 2007 the student earned 117 of 132 attempted credits but again, did not earn a degree. Five years later she re-enrolled at PCC, but was placed on Financial Aid Suspension for failing to meet the maximum timeframe guidelines, therefore her financial aid was terminated. The student appealed this determination and PCC disbursed Pell funds for the Spring 2012 term. However the reason for the student's appeal of SAP was not provided.*

Student 24: *The student received Pell Grant funds almost every year since 1999. Through the Spring 2004 term, the student earned three Associate degrees. One degree was an Associate in Applied Science – Office Systems Technology in Spring 2003; an Associate in Applied Science – Business Administration in Spring 2004 and Associate in Applied Science – Business Administration/E-Commerce also in Spring 2004. At this point the student earned 156 of 180 attempted hours.*

Subsequent to completing three degrees, the student returned in Fall 2004. Based on the academic transcript, the reviewers could not determine if the student was enrolled in an eligible program or not. She has not graduated and was still taking courses. It appears that the student exceeded the maximum timeframe as of Spring 2004 and may not have been eligible for Pell Grant funds disbursed for the 2004-2005; 2005-2006; 2006-2007; 2007-2008; 2008-2009; 2009-2010; and the 2011-2012 award years.

Student 25: *The student graduated with an Associate Degree in Business Administration at the end of Fall 2007 and an Associate Degree in Accounting in Spring 2008. Upon completion of her second degree, the student earned 135 of 162 attempted credits. The student then enrolled in the Office Administration program in Fall 2008. The maximum timeframe for that program is 110 credits. Because she had already attempted 162 credits, she may not have been eligible for Title IV aid for the 2008-2009; 2009-2010; 2010-2011 and 2011-2012 award years.*

Student 31: *The student earned 30 credits prior to beginning the Associate in Nursing program in Fall 2006. (School officials stated that Associate in Nursing students are required to enroll in an Associate in General Education* *degree prior to enrolling in Nursing.) However, by Spring 2008, it appeared that the student was no longer taking courses required for the Nursing program. The reviewers also noted that as of the end of Fall 2011 the student had attempted 107 credits cumulatively, but continued to receive aid for Spring 2012. Not only did the student appear to have exceeded the maximum timeframe for her original degree(s), it is uncertain whether the student was enrolled in an eligible program, or merely taking classes.*

Required Action Summary: *PCC was required to review all 2010-2011 and 2011-2012 Title IV recipients in order to confirm or deny academic progress, and, their eligibility for aid. The institution was first required to establish students' primary program of study and identify courses that were counted as part of that program. Next PCC was required to:*

- *Complete an audit of the student's academic transcript to ascertain whether or not Title IV was used to pay for only required courses, and,*
- *Calculate the student's GPA, course completion (67%) and maximum timeframe (150%) for the student's program of study.*

PCC's Response: The institution checked classes for each student's program of study during the applicable semesters. Students' GPAs, course completion rate (of 67%), maximum timeframe (150%), and (student) appeals of SAP for financial aid purposes, were all also checked for each student

- With respect to the seven students above, PCC confirmed eligibility for students 6, 9, and 31.
- PCC confirmed that student 18 received an ineligible Pell Grant payment of $694 in the Spring 2011 term for classes that were not part of her major.
- PCC confirmed that student 25 exceeded the maximum timeframe for SAP, therefore she received ineligible payments of Pell ($4857) and Federal Supplemental Education Opportunity Grant (FSEOG) ($200[1]) for the 2011-2012 award year.
- PCC's response reported that Title IV aid disbursed to students 19 and 24 for the Spring 2012 term was eligible because the students were approved for their appeals of SAP. However, these students did not appeal on the basis of: injury or illness, the death of a relative, or other special circumstances. The appeals were based on immaturity and being a single mother. In addition, explanations were vague, and there was no documentation of special circumstances. Accordingly, they were not eligible for Spring 2012 aid. Both students (19 and 24) received $2775 in Pell Grant funds. Additionally, student 24 received $2250 and $3000 in Subsidized and Unsubsidized Federal Direct Loans (FDLs), respectively.

[1] Student 25 received $200 in FSEOG, not $100 as reported by PCC.

NOTE: The SAP approval letter issued by the Financial Aid Appeals Committee contains a statement that is not correct, and, which conflicts with PCC's revised SAP Policy. A student may be placed on SAP warning for one term only, whereas PCC's (appeal) approval letter implies that a student can be on warning status until he or she brings up his or her qualitative and quantitative components of SAP. As a reminder, students who fail to make satisfactory progress after the warning period lose their aid eligibility unless they successfully appeal and are placed on probation.

In lieu of performing a file review for the entire population of PCC's 2010-2011 and 2011-2012 Title IV recipients to determine actual liabilities, PCC chose the option to review only the remainder of the statistical sample not tested by the Department during the program review. The Department projected liabilities based on the results of a review of a valid statistical sample completed by PCC. **(Please refer to Appendix C and Appendix D for results submitted to our office on September 12, 2012.)** An average liability was calculated for the statistical sample for each Title IV program with liabilities, and this average was multiplied against the population being reviewed.

Final Determination: PCC's response indicates that the total amount of Federal Pell Grant liabilities in the statistical sample for the 2010-2011 award year is $83,871.11. An average liability of $275.89 was calculated by dividing $83,871.11 by the number of students in the statistical sample (304). This average liability was then multiplied by the total number of students in the population (1464) from which the statistical sample was derived. Therefore the Pell Grant projected liability amount for this finding that PCC must pay to the Department is $403,903. (Refer to the Projection Matrix attached as Appendix C.)

PCC's response indicates that the total amount of FSEOG liabilities in the statistical sample for the 2010-2011 award year is $500. An average liability of $1.64 was calculated by dividing $500 by the number of students in the statistical sample (304). This average liability was then multiplied by the total number of students in the population (1464) from which the statistical sample was derived. Therefore the FSEOG projected liability amount for this finding that PCC must pay to the Department is $2401. (Refer to the Projection Matrix attached as Appendix C.)

PCC's response indicates that the total amount of Pell Grant liabilities in the statistical sample for the 2011-2012 award year is $42,731.98. An average liability of $141.97 was calculated by dividing $42,731.98 by the number of students in the statistical sample (301). This average liability was then multiplied by the total number of students in the population (1396) from which the statistical sample was derived. Therefore the Pell Grant projected liability amount for this finding that PCC must pay to the Department is $198,190. (Refer to the Projection Matrix attached as Appendix D.)

PCC's response indicates that the total amount of FSEOG liabilities in the statistical sample for the 2011-2012 award year is $400. An average liability of $1.33 was calculated by dividing $500 by the number of students in the statistical sample (301). This average liability was then multiplied by the total number of students in the population (1396) from which the statistical sample was derived. Therefore the FSEOG projected liability amount for this finding that PCC must pay to the Department is $1857. (Refer to the Projection Matrix attached as Appendix D.)

PCC's response indicates that the total amount of Subsidized Federal Direct Loan (FDL) liabilities in the statistical sample for the 2011-2012 award year is $9000. An average liability of $29.90 was calculated by dividing $9000 by the number of students in the statistical sample (301). This average liability was then multiplied by the total number of students in the population (1396) from which the statistical sample was derived. Therefore the Subsidized FDL projected liability amount for this finding is $41,740. (Refer to the Projection Matrix attached as Appendix D.)

PCC's response indicates that the total amount of Unsubsidized FDL liabilities in the statistical sample for the 2011-2012 award year is $10,199. An average liability of $33.88 was calculated by dividing $10,199 by the number of students in the statistical sample (301). This average liability was then multiplied by the total number of students in the population (1396) from which the statistical sample was derived. Therefore the Unsubsidized FDL projected liability amount for this finding is $47,296. (Refer to the Projection Matrix attached as Appendix D.)

In lieu of requiring the institution to assume the risk of default by purchasing the ineligible loans from the holder, the Department has asserted a liability not for the loan amounts, but rather for the estimated actual or potential loss that the government may incur with respect to the ineligible loans. The estimated actual loss (EAL) to the Department that has resulted or will result from those ineligible loans is based on the most recent sector default rate available for institutions such as PCC (2-year public institutions). The EAL liability for this finding is $2721; a copy of the EAL calculation is attached as **Appendix E.**

The institution must also pay for the cost of funds on the ineligible Pell Grant and FSEOG expenditures. The Cost of Funds (COF) is the expense the Department incurred as a result of the institution retaining ineligible funds. The rate of interest is based on when the funds should have been returned to the Department. The COF liability for this finding is $7508; a copy of the COF calculation is attached as **Appendix F**.

The total liability due to the Department for improper SAP policies and procedures is $616,580. Please refer to the Payment Section of this letter for instructions regarding the electronic transmittal of these funds.

D. Summary of Liabilities

The total amount of liabilities resulting from the findings in the program review determination is as follows:

Award Year	Pell Grant	FSEOG	EAL	COF
2010-2011	$403,903	$ 2,401	$ 2,721	$ 6,368
2011-2012	$198,190	$ 1,857	--	$ 1,140
Subtotal	*$602,093*	*$ 4,258*	*$ 2,721*	*$ 7,508*
Total	$616,580			

E. Payment Instructions

PAYMENT LANGUAGE

Liabilities Owed to the Department

PCC owes **$616,580.00** to the Department. This liability must be paid using an electronic transfer of funds through the Treasury Financial Communications System, which is known as FEDWIRE. PCC must make this transfer within **45 days of the date of this letter**. This repayment through FEDWIRE is made via the Federal Reserve Bank in New York. If PCC's bank does not maintain an account at the Federal Reserve Bank, it must use the services of a correspondent bank when making the payments through FEDWIRE.

Any liability of $100,000 or more identified through an audit must be repaid to the Department via FEDWIRE. The Department is unable to accept any other method of payment in satisfaction of these liabilities. ***Payments and/or adjustments made via G5 will not be accepted as payment of this liability.***

Instructions for completing the electronic fund transfer message format are included on the attached FEDWIRE form.

Terms of Payment

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within **45 days** of the date of this letter. If payment is not received within the **45-day** period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. PCC is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivable Group at (202) 245-8080 and ask to speak to PCC's account representative.

If full payment cannot be made within **45** days of the date of this letter, contact the Department's Accounts Receivable Group to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

U.S. Department of Education
OCFO Financial Management Operations
Accounts Receivable Group
550 12th Street, S.W., Room 6111
Washington, DC 20202-4461
Attn: Cindy Dixon, Acting Supervisor, Accounts Receivable Group

If within **45** days of the date of this letter, PCC has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due the institution from the Federal Government. **PCC may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt PCC must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided**. If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

FEDWIRE EFT MESSAGE FORMAT & INSTRUCTIONS

ABA Number 021030004	**Type/Sub-Type**	
Sender No.	**Sender Ref. No.**	**Amount (1)**

Sender Name (Automatically inserted by the Federal Reserve Bank)

Treasury Department Name/CTR/
TREAS NYC/CTR/

BNF=ED/AC-91020001 OBI=

Name/City/State:
(2)

EIN/PIN: **AGENCY CODE:**
(3) **60**

FOR:
(4)

INSTRUCTIONS

A. Complete items 1-4 in parentheses above as follows:

(1) Indicate amount including cents digits.
(2) Indicate Name, City and State.
(3) Indicate DUNS and EIN.
(4) Enter the reason for the remittance. (ACN or PRC)

B. Provide the sending bank with a copy of the completed form. This form contains other information the bank will need to transmit the FEDWIRE message.

APPENDIX A

START HERE
GO FURTHER
FEDERAL STUDENT AID

Prepared for

Piedmont Community College

OPE ID: 00964600
PRCN: 201220427838

Prepared by

U.S. Department of Education
Federal Student Aid
School Participation Team - Atlanta

Program Review Report

May 29, 2012

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Appendix-A: Student Sample
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A. Institutional Information

Piedmont Community College
1715 College Drive
Roxboro, NC 27573-1197

Type: 2-Year, Public

Highest Level of Offering: Associate's Degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges (SACS)

Current Student Enrollment: 1869 (2011-2012)

% of Students Receiving Title IV: 58% (2011-2012)

Title IV Participation:

Program	2011-2012 (to date)
Federal Direct Loan (FDL)	$1,111,671
Federal Pell Grant (Pell)	$4,476,262
Federal Supplemental Education Grant (FSEOG)	$ 46,330
Federal Work Study (FWS)	$ 40,610

Default Rate FDL:	2009	0%
(Participation began 7/1/2011)	2008	0%
	2007	0%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Piedmont Community College (PCC) from March 26, 2012 – March 30, 2012. The review was conducted by Lisa Lancaster, Sherry Blackman and Brian Huckaby.

The focus of the review was to determine PCC's compliance with the statutes and Federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of PCC's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 36 files was identified for review from the 2010-2011 and 2011-2012 (year to date) award years. The files were selected randomly from a statistical sample of the total population of students receiving Title IV, HEA program funds for each award year. **Appendix A** lists the names and social security numbers of the students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning PCC's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, the program review does not relieve PCC of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

C. Findings

During the review several areas of noncompliance were noted. Findings of non-compliance are referenced to the applicable statutes and regulations, and specify the actions to be taken by PCC to bring operations of the financial aid programs into compliance with the statutes and regulations.

D. Appendices

Appendix A (Student Sample) is attached to this report. **Appendix B** and **C** list the students who were chosen as the Statistical Sample for this program review for each award year. All appendices contain personally identifiable information (PII).

Finding 1: Student Eligibility - Satisfactory Academic Progress Not Clear

Citation: General Provisions 34 C.F.R. § 668.32 (a) states that a student must be enrolled as a regular student in an eligible program in order to receive Title IV funds. A regular student is someone who is enrolled or accepted for enrollment in an eligible institution for the purpose of obtaining a degree or certificate offered by the school.

34 C.F.R. §§ 668.16 (e), 668.32 (f) and 668.34 require institutions to establish, publish, and apply reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory academic progress (SAP) in his or her educational program. The Secretary considers an institution's standards to be reasonable if they are at least as strict as that for students who are not receiving Title IV funds, and are applied consistently to all educational programs and to all students within categories (e.g., full-time, part-time, undergraduate and graduate students).

An SAP policy for Title IV purposes must specify the *qualitative* standard (grade point average or GPA) that a student must have at each evaluation or, if a GPA is not an appropriate qualitative measure, a comparable measure against a norm.

A valid SAP policy must also specify the *quantitative* standard, or state the minimum amount of work students must complete in each increment. This does not have to be a fixed number of hours or credits. Instead, a school can require students to complete a certain percentage of the hours or credits they attempt. This allows for variations in enrollment status and is to ensure that students will graduate within the maximum timeframe. The *quantitative* component must be no longer than 150% of the published length of a student's educational program. For instance, if the published length of an academic program is 60 credit hours, the maximum period must not exceed 90 (60 × 1.5) attempted credit hours.

If a school's evaluation of a student's SAP makes it clear that he or she cannot mathematically finish his or her educational program within the maximum timeframe, the student becomes ineligible for Title IV aid (unless he or she has extenuating circumstances and successfully appeals the school's determination of SAP). Each check of academic progress must measure the qualitative and quantitative component.

The Department published amendments to SAP on October 29, 2010, which became effective on July 1, 2011. Among those changes, one significant modification is that the policy provides that a student's academic progress is evaluated—

- At the end of each payment period if the educational program is either one academic year in length or shorter than an academic year; or
- For all other educational programs, at the end of each payment period <u>or</u> at least annually to correspond with the end of a payment period.

If a check of SAP shows that a student does not have the required GPA or is not maintaining the required pace, he or she becomes ineligible for Title IV funds unless placed on financial aid warning or probation, as defined:

Financial aid warning: Only schools that check SAP at the end of each payment period may place students on financial aid warning as a consequence of not making satisfactory progress. A school may do this without a student appeal. Warning status lasts for one payment period, during which the student may continue to receive Title IV funds. Students who are still failing to make satisfactory progress after the warning period lose their aid eligibility unless they successfully appeal and are placed on probation.

Financial aid probation: A status a school assigns to a student who is failing to make SAP and who successfully appeals. Eligibility for aid may be reinstated for one payment period only. While a student is on financial aid probation, the institution may require him or her to fulfill specific terms and conditions such as taking a reduced course load or enrolling in specific courses. At the end of one payment period on financial aid probation, the student must meet the institution's SAP standards or meet the requirements of an academic plan developed by the institution in order for the student to qualify for further Title IV funds.

Appeal: A process by which a student who is not meeting SAP standards petitions the school for reconsideration of his eligibility for FSA funds. A student may appeal that result of not making SAP on the basis of: injury or illness, the death of a relative, or other special circumstances. The appeal must explain why he or she failed to make satisfactory progress and what has changed in his or her situation that will allow him or her to make satisfactory progress at the next evaluation. Students who fail the satisfactory progress check after the end of the probationary payment period may only continue to receive aid if they successfully appeal, the school develops an academic plan, and they will meet the standards by a specific time.

An institution must also explain how students who are not making SAP can restore their eligibility for Title IV funds. Other than when a student is placed on financial aid warning, probation, or has agreed to an academic plan as outlined above, he or she can regain eligibility only by taking action that brings the student into compliance with the school's standards.

Please refer to 34 C.F.R. § 668.34 for additional amendments to SAP requirements.

Noncompliance: The institution's SAP policy for Title IV recipients effective until Fall 2011 was for students to meet the established standard of a **2.0** GPA; a rate of completion of **67%**; and a maximum timeframe of **150%** of the published length of the student's educational program. The policy also stated that students not meeting the standards were placed on financial aid probation and allowed to receive financial aid for up to two additional terms in an attempt to achieve satisfactory progress. If students did not meet the standards at the end of the probation period, financial aid was suspended until SAP was met.

Unlike most institutions, PCC has students who enroll in more than one educational program either concurrently or consecutively. The institution's determination of maximum timeframe is not addressed in its published SAP policy for:

- Students enrolled in multiple programs concurrently; or,
- Students enrolled in multiple programs consecutively.

School officials stated that the determination of SAP for Title IV recipients is based on a student's *primary* degree. Officials also stated that students who take courses that are *not* part of their degree program risk getting too close to the 150% maximum timeframe because this inflates the quantitative calculation of SAP.

Despite the explanation of how SAP was determined for Title IV recipients, it appears that PCC failed to monitor students' progress toward graduation. These students do not appear to be making SAP for reasons as follows:

Student 6: The student enrolled at PCC for the Fall 2008 semester. By the end of the Spring 2010 semester, the student had completed only 12 of the 28 credits she attempted (including remedial classes). However, there was no record to indicate the student was placed on probation. (The student's 2010-2011 Title IV remains eligible assuming that PCC properly placed her on probation.)

Student 9: The student has received Federal Pell Grant (Pell) funds since the 2002-2003 award year plus funds in 1999-2000. Through the Spring 2010 term, the student earned two Associate degrees (and 146 of 166 attempted semester credits). One degree was an Associate in Applied Science – Medical Office Administration in Spring 2007 and the other was an Associate in Applied Science – Business Administration in Spring 2010.

Subsequent to completing two degrees, the student returned to PCC in Fall 2010 to earn a degree in Web Technology. The maximum timeframe for that program is 110 credits. Because she had already attempted 166 credits, she exceeded the number of credits to be eligible for the Title IV aid she received for the 2010-2011 and 2011-2012 award years.

Student 18: The student's file reports that she is enrolled for PCC's Associate in Nursing program. The student did not meet the standards for SAP at the end of the Spring 2011 term because she did not complete 67% of attempted credits and her GPA dropped to 1.9. The student was placed on academic probation following the Spring 2011 term. However, during the Fall 2011 term the student exceeded 150% of the maximum timeframe for her program. (The maximum timeframe was 109 credits but she attempted 117 credits.) And although the credits exceeded her program of study, PCC disbursed $2775 in Pell funds for Spring 2012.

School officials stated that Nursing students are required to enroll in an Associate in General Education degree (64 credits) prior to Nursing. However, the student's courses per the academic transcript do not support Nursing or the Associate in General Education degree. (The student enrolled in courses such as Microeconomics, Anatomy, British Lit, but also Into to Film, Business Law, Religion, Sociology, etc.). The student's eligibility for financial aid is not clear because it is uncertain whether the student is enrolled in an eligible program, or merely taking classes.

Student 19: The student was continually enrolled from 1992 to 1996 before re-enrolling. At the end of Spring 1996, the student was not making SAP because she exceeded the maximum timeframe (with 103 credits) and still had not earned an Associate degree. However, PCC disbursed Pell funds to the student for the 2006-2007 award year (upon her return to school).

As of Spring 2007 the student earned 117 of 132 attempted credits but again, did not earn a degree. Five years later she re-enrolled at PCC, but was placed on Financial Aid Suspension for failing to meet the maximum timeframe guidelines, therefore her financial aid was terminated. The student appealed this determination and PCC disbursed $2775 in Pell funds for the Spring 2012 term. However the reason for the student's appeal of SAP was not provided.

Student 24: The student has received Pell Grant funds almost every year since 1999. Through the Spring 2004 term, the student earned three Associate degrees. One degree was an Associate in Applied Science – Office Systems Technology in Spring 2003; an Associate in Applied Science – Business Administration in Spring 2004 and Associate in Applied Science – Business Administration/E-Commerce also in Spring 2004. At this point the student had earned 156 of 180 attempted hours.

Subsequent to completing three degrees, the student returned in Fall 2004. Based on the academic transcript, the reviewers could not determine if the student was enrolled in an eligible program or not. She has not graduated and is still taking courses. It appears that the student exceeded the maximum timeframe as of Spring 2004 and may not have been eligible for Pell Grant funds disbursed for the 2004-2005; 2005-2006; 2006-2007; 2007-2008; 2008-2009; 2009-2010; and the 2011-2012 award years.

Student 25: After being away from PCC for many years, the student re-enrolled in the Business Administration program in Fall 2005. She graduated with an Associate Degree in Business Administration at the end of Fall 2007 and an Associate Degree in Accounting in Spring 2008. Upon completion of her second degree, the student earned 135 of 162 attempted credits. The student then enrolled in the Office Administration program in Fall 2008. The maximum timeframe for that program is 110 credits. Because she had already attempted 162 credits, she may not have been eligible for Title IV aid for the 2008-2009; 2009-2010; 2010-2011 and 2011-2012 award years.

Student 31: It appears that this student earned 30 credits prior to beginning the Associate in Nursing program in Fall 2006. (School officials stated that Associate in Nursing students are required to enroll in an Associate in General Education degree prior to enrolling in Nursing.) However, by Spring 2008, it appeared that the student was no longer taking courses required for the Nursing program. The reviewers also noted that as of the end of Fall 2011 the student had attempted 107 credits cumulatively, but continued to receive aid for Spring 2012. Aid should not have been disbursed for Spring 2012 because it was not mathematically possible for the student to complete the Nursing degree within the 150% timeframe. (According to the revised SAP policy, she should have been placed on academic warning for the Spring 2012 but was not.)

Not only does the student appear to have exceeded the maximum timeframe for her original degree(s), it is uncertain whether the student is enrolled in an eligible program, or merely taking classes.

Required Action: PCC is required to review the eligibility of all 2010-2011 and 2011-2012 Title IV recipients in order to confirm or deny their eligibility. The institution must establish the student's primary program of study and identify courses that were counted as part of that program. Next PCC must:

- Complete an audit of the student's academic transcript to ascertain whether or not Title IV was used to pay for only required courses, and,
- Calculate the student's GPA, course completion (67%) and maximum timeframe (150%) for the student's program of study.

PCC must apply the former SAP policy when examining the history of students who received aid in 2010-2011 but must use the new policy when reviewing the history of the 2011-2012 aid recipients.

PCC's review must identify any ineligible aid that was disbursed to a student:

- Who was not enrolled in an eligible program (e.g., simply taking courses);
- For a payment period(s) beyond the maximum timeframe for his or her program of study; or
- Who received Title IV aid based on an appeal of special circumstances that were not documented.

With the exception of Federal Work Study (FWS) funds, ineligible Title IV aid must be reported by term, and in the following spreadsheet format:

- Student's name and social security number
- Ineligible amount of aid by program or loan type, and,
- Date of disbursement.

FALL 2010
INELIGIBLE DISBURSEMENTS

Name	SSN	Pell	Date	FSEOG	Date	Sub	Date	Unsub	Date
Last, First	123456789	$2775	9/16/10	$400	9/16/10	$0	n/a	$0	n/a

In lieu of performing a file review for the entire population of PCC's 2010-2011 and 2011-2012 Title IV recipients to determine actual liabilities, PCC has the option of performing this file review for only the remainder of the statistical sample not tested by the Department during the program review. This option is intended to reduce the burden on the institution of conducting a full file review.

For the 2010-2011 Award Year:

There were **304** students in the statistical sample and **18** were tested during the program review, therefore **286** remain. The results from this file review using the statistical sample will be used to project liabilities for the entire population of **1464** students (e.g., the average liability for the recipients in the statistical sample will be multiplied by the total population).

For the 2011-2012 Award Year:

There were **301** students in the statistical sample and **18** were tested during the program review, therefore **283** remain. The results from this file review using the statistical sample will be used to project liabilities for the entire population of **1396** students (e.g., the average liability for the recipients in the statistical sample will be multiplied by the total population).

Six students noted in this finding (**students 9, 18, 19, 24, 25 and 31**) must be included in PCC's review of records for the applicable year. The file of **student 6** does not need to be re-reviewed.

If PCC wishes to select the projection option, please use the statistical sample lists for the applicable award year, attached as **Appendix B** and **Appendix C**.

If PCC elects to do the full file reviews, it is recommended that the institution first review the remainder of the students in the statistical sample. At that point, PCC may decide to accept liability projection instead of continuing with full file reviews.

Please send the file review summary report (spreadsheet) to Lisa Lancaster by e-mail at: lisa.lancaster@ed.gov. See the enclosure Protection of Personally Identifiable Information for instructions regarding electronic submissions to the Department for data containing PII. Separate from the institution's spreadsheet, PCC must email an access password to Ms. Lancaster.

Instructions for the repayment of any identified liabilities will be provided in the Final Program Review Determination letter.

The institution's response to this finding must specify how SAP will be determined for Title IV recipients' program of student in the future.

PCC is also reminded that the Consolidated Appropriations Act 2012 will significantly impact the Federal Pell Grant program. Beginning July 2012, students will be limited to 12 semesters (or 600%) of Pell Grant eligibility during their lifetime. This change affects all students regardless of when or where they received their first Pell Grant. Students who are currently receiving the Pell Grant in the academic year 2011-2012 and have already used *600%* of their Pell Grant eligibility will no longer be eligible to receive a Pell Grant starting July 2012. Schools will receive reports that will include information on the school's 2012-2013 applicants who have received Pell Grant funding in excess of *450% or more*. For further information on Pell Lifetime Eligibility Used (LEU), please refer to the Department's Electronic Announcement dated February 17, 2012 or the Information for Financial Aid Professionals (IFAP) Web site at: http://ifap.ed.gov/ifap.

Finding 2: Published Academic Progress Policy Not Current

Citation: Any institution that participates in the Title IV programs is required to publish and make readily available to current and prospective students, a description of Federal, State, private and institutional financial assistance programs available to students who enroll at that institution. 34 C.F.R. § 668.42.

An institution must describe the rights and responsibilities of students receiving financial assistance and, specifically, assistance under the Title IV programs. Amongst other information, an institution must also explain the—

- Criteria for continued student eligibility under each program;
- Standards which the student must maintain in order to be considered to be making satisfactory progress in his or her course of study for the purpose of receiving financial assistance; and
- Criteria by which the student who has failed to maintain satisfactory progress may reestablish his or her eligibility for financial assistance.

Noncompliance: PCC's Financial Aid SAP Policy that became effective in Fall 2011 is not published on the school's website, in the school catalog or the Student Handbook & Planner. The school's published policy says: "A student who fails to meet the minimum standards of academic progress is placed on probation for the next semester of attendance. During the semester on probation, the student is required to sign an Educational Contract which specifies the courses to be taken, extra help necessary to improve the academic standing, and the grades needed to continue enrollment. Students on academic probation may not be eligible for financial aid during the probationary semester. A student on academic probation must wait to register for the subsequent semester until the previous semester grades are available."

The published policy does not clearly explain the qualitative and quantitative standards that are required for Title IV recipients. The published policy also fails to explain how remedial courses are treated, and, the consequences of 'academic warning' which became effective in Fall 2011.

Required Action: The institution is required to ensure that all financial aid and consumer information is maintained on a current basis. You may refer to Volume 2 of the Department's Federal Student Aid Handbook or the Program Integrity website at: http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/sap.html#gen for additional guidance.

In response to this finding, please explain how PCC students will be informed of their responsibilities to maintain SAP for Title IV purposes.

Finding 3: Title IV Account Not Identified as Containing Federal Funds

Citation: For each bank account that includes Title IV program funds, an institution must clearly identify that Title IV funds are maintained in that account by:

- Including the phrase "*Federal Funds*" in the name of the account, or
- Notifying the bank or investment company of the accounts that contain Title IV funds.

Institutions must keep a copy of this notice in its records and, except for public institutions, a Uniform Commercial Code Form (UCC-1) statement with the appropriate state or municipal government entity that discloses that an account contains Federal funds.

Noncompliance: PCC's account which contains Federal does not include the phrase "*Federal Funds*" in the name of the account, nor could school officials provide documentation of notice to the bank that the account contains Title IV funds.

Required Action: Your response to this finding must include a copy of the notification to the bank in which PCC maintains Title IV funds, that these monies are Federal funds.

APPENDIX A
STUDENT SAMPLE

2010-2011

	LAST	FIRST	SSN
1.	(b)(6); (b)(7(C)		
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2011-201

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APPENDIX B

Piedmont Community College
Program Review Response
PRCN: 201220427838
September 10, 2012

Piedmont Community College received the Program Review Report from the Department of Education on June 4, 2012. The review by the U.S. Department of Education personnel during the March 26-30 on-campus review of PCC Title IV programs resulted in three findings. This narrative includes the institution's response to each finding, additional required actions requested by the Department, and corrective actions implemented by the College.

Finding 1: Student Eligibility – Satisfactory Academic Progress Not Clear

Noncompliance
The institution's SAP policy for Title IV recipients effective until Fall 2011 was for students to meet the established standard of 2.0 GPA; rate of completion of 67%; and a maximum timeframe of 150% of the published length of students' educational programs. The policy also stated that students not meeting the standards were placed on financial aid probation and allowed to receive financial aid for up to two additional terms in an attempt to achieve satisfactory progress. If students did not meet the standards at the end of the probation period, financial aid was suspended until SAP was met. Despite the explanation of how SAP was determined for Title IV recipients, it appears that PCC failed to monitor students' progress toward graduation. Seven students from the sample were cited (One did not require further review).

Required Action
PCC is required to review the eligibility of all 2010-2011 and 2011-2012 Title IV recipients in order to confirm or deny their eligibility. The institution must establish the student's primary program of study and identify courses that were counted as part of that program. Next PCC must:

- Complete an audit of the student's academic transcript to ascertain whether or not Title IV was used to pay for only required courses (Appendix A)
- Calculate the student's GPA, course completion (67%), and maximum timeframe (150%) for student's program of study (Appendix B).

PCC must apply the former SAP policy when examining the history of students who received aid in 2010-2011 but must use the new policy when reviewing the history of the 2011-2012 aid recipients. PCC must report the information in the prescribed spreadsheet format and may choose to use the statistical sample provided. The six students noted in the finding must be included in PCC's review of records for the applicable year.

Institution's Response

Prior to Fall 2011, Piedmont Community College was evaluating SAP for students once a year (after the spring term) to determine if they were making satisfactory academic progress, unless they were majoring in a certificate program of study.

Our understanding of the policy prior to Fall 2011 was that students not making SAP could be placed on Financial Aid Probation until the next time SAP was checked, which was during the Spring term of each academic year. Effective Fall 2011, Piedmont Community College started monitoring SAP at the end of each semester, and students on maximum time frame were placed on suspension if they had exceeded their maximum number of hours allowed for their primary program of study.

The following students were part of the Student sample, and a second evaluation as noted was requested for these students.

Student 9: This student received 2 Associate degrees: one in Medical Office Administration (Spring 2007) and one in Business Administration (Spring 2010). She has also attempted 12 remedial hours, which are not included in her max time frame calculations. The student had attempted 95 hours when she received her Associate Degree in Medical Office Administration. She had attempted 77 hours when she received her Business Administration Associate degree. She has attempted 42 hours after Spring 2010 towards her Web Technology degree, which has a max time frame of 110 credits.

Student 18: Student was placed on financial aid probation following the Spring 2011 term, because her GPA went below 2.00, and she had not completed 67% of her attempted hours after that term. The student exceeded maximum time frame after the Fall 2011 term and was placed on financial aid suspension. The student submitted and was approved for an appeal prior to the Spring 2012 term. The student was enrolled in courses that were part of the Associate in Science and Associate in Arts program. The student was also majoring in these programs of study.

Student 19: At the end of Spring 1996, the student had not exceeded the maximum time frame, because she had 8 remedial hours that were not included in her attempted hours. After Fall 2006, the student still had not exceeded the maximum time frame, because she had attempted 8 remedial hours during this term. Her SAP status was updated to Suspension for maximum time frame after the spring 2007 term. The student received an appeal for the spring 2012 term seeking additional time to finish her degree. Her appeal was granted.

Student 24: Student has received several degrees from Piedmont Community College. She has received 4 Associate degrees while attending college here. She was placed on Financial Aid Warning after the Spring 2010 term and Financial Aid Suspension after the Fall 2011 term. The student was approved for an appeal for the Spring 2012 term.

Student 25: Student has received 2 Associate Degrees from Piedmont Community College. She received her Associate degree in Business Administration after December 2007 and her Associate degree in Accounting for the Spring 2008 term. The student was enrolled in Business Administration once she returned to Piedmont Community College for the Fall 2005 term. She did not exceed the maximum time frame for the Spring 2004 term. Student should have been placed on Maximum time frame after the Spring 2006 term.

Student 31: Student did not receive financial aid from Piedmont Community College for the Spring 2012 term, because she was attending another college at the same time. She paid her own tuition for this term.

Piedmont Community College reviewed the eligibility of 304 students in the statistical sample for the 2010-2011 award year and 301 students in the statistical sample for the 2011-2012 award year. Classes were checked for their programs of study during the applicable semesters. The student's GPA, course completion rate (67%), and maximum time frame (150%) were checked for each of these students. See Appendix A and B. Appendix A: 13 students in the two samples were identified with courses outside their major. Appendix B: 2010/2011 22 unduplicated students were identified (3 GPA, 1 course completion rate, and 18 maximum time frame); 2011/2012 14 unduplicated students were identified (1 GPA, 1 course completion rate, and 12 maximum time frame).

Piedmont Community College had already corrected this action effective Fall 2011 according to the new amendments established by the Department of Education on October 29, 2010. The revised SAP policy (Appendix C) addresses how Piedmont Community College will determine SAP for Title IV recipients in the future. As stated in the College Catalog (page 34), "Students may enroll in two curriculum programs concurrently." http://www.piedmontcc.edu/Portals/0/Documents/CollegeCatalog/2011-13/08-AcademicRegulations.pdf . The maximum of two majors are classified as a primary and secondary major.

Finding 2: Published Academic Progress Policy Not Current

Noncompliance

PCC's Financial Aid SAP Policy that became effective in Fall 2011 is not published on the school's website, in the School's catalog, or in the student Handbook & Planner. The published policy does not clearly explain the qualitative and quantitative standards that are required for Title IV recipients. The policy also fails to explain how remedial courses are treated and the consequences of 'academic warning' which became effective in Fall 2011.

Required Action

The institution is required to ensure that all financial aid and consumer information is maintained on a current basis. In response to this finding, please explain how PCC students will be informed of their responsibilities to maintain SAP for Title IV purposes.

Institution's Response

The revised SAP policy (Appendix C) is on the school's website and will be included with the next published General Catalog and Student Handbook. The SAP policy that is mailed to students with their award letters has been revised for the 2012-2013 award year. (Appendix D)

Financial aid students will be informed of their responsibilities to maintain SAP for Title IV purposes in the following manner:

-Updated copy of SAP policy is included with the award letter for the 2012-2013 award years

-Copy of current SAP policy is on the school's website
http://www.piedmontcc.edu/Portals/0/Documents/Forms/PP%20Section%2020REVISED9.10.12Website.pdf

-Copy of current SAP policy will be included with the next published General Catalog and Student Handbook

-Additional financial aid workshops are being held for students

-SAP is covered at Loan Entrance Session at the college

-Financial Aid Personnel will conduct workshops in selected curriculum classes

-Financial Aid Office will collaborate with Academic Advising to coordinate workshops for students on Academic Probation

-Students approved for academic plans on appeal will be counseled to make sure they are aware of sources available on campus to assist them

-The Satisfactory Academic Progress Appeal Request Form (Appendix E) has been improved and revised

Finding 3: Title IV Account Not Identified as Containing Federal Funds

Noncompliance

PCC's account which contains Federal Funds does not include the phrase "Federal Funds" in the name of the account nor could school officials provide documentation of notice to the bank that the account contains Title IV funds.

Required Action

Provide a copy of the notification to the bank, which PCC maintains Title IV funds, that these monies are Federal funds.

Institution's Response

Piedmont Community College notified SunTrust Bank that federal funds are being and have been deposited in PCC institutional accounts. The June 13, 2012 letter is attached in Appendix F.

Appendices

Appendix A –Statistical Sample Results – Courses Not In Major

Appendix B –Statistical Sample Results – SAP (GPA, 67%, Maximum Time Frame)

Appendix C –Revised SAP Policy

Appendix D – SAP Policy Letter Mailed to Students

Appendix E – The Satisfactory Academic Progress Appeal Request Form

Appendix F– Letter to Bank – Federal Funds Identified

Statistical Sample Projection Matrix - Single Finding

Institution: **P.C.C.** **Appendix C** **2010-2011**

Population Size	1464
Statistical Sample Size	304

Finding 1: S.A.P.

Liability Projection Worksheet

Year	Name:	SSN:	Pell	Unsub Loan	Sub Loan	Perkins	FSEOG
1	(b)(6); (b)(7(C)		694.00	0.00	0.00	0.00	0.00
2			0.00	0.00	0.00	0.00	0.00
3			0.00	0.00	0.00	0.00	0.00
4			0.00	0.00	0.00	0.00	0.00
5			0.00	0.00	0.00	0.00	0.00
6			0.00	0.00	0.00	0.00	0.00
7			0.00	0.00	0.00	0.00	0.00
8			0.00	0.00	0.00	0.00	0.00
9			0.00	0.00	0.00	0.00	0.00
10			0.00	0.00	0.00	0.00	0.00
11			0.00	0.00	0.00	0.00	0.00
12			0.00	0.00	0.00	0.00	0.00
13			0.00	0.00	0.00	0.00	0.00
14			0.00	0.00	0.00	0.00	0.00
15			0.00	0.00	0.00	0.00	0.00
16			0.00	0.00	0.00	0.00	0.00
17			0.00	0.00	0.00	0.00	0.00
18			0.00	0.00	0.00	0.00	0.00
19			0.00	0.00	0.00	0.00	0.00
20			0.00	0.00	0.00	0.00	0.00
21			0.00	0.00	0.00	0.00	0.00
22			0.00	0.00	0.00	0.00	0.00
23			0.00	0.00	0.00	0.00	0.00
24			0.00	0.00	0.00	0.00	0.00
25			0.00	0.00	0.00	0.00	0.00
26			0.00	0.00	0.00	0.00	0.00
27			0.00	0.00	0.00	0.00	0.00
28			0.00	0.00	0.00	0.00	0.00
29			3469.00	0.00	0.00	0.00	0.00
30			0.00	0.00	0.00	0.00	0.00
31			2775.00	0.00	0.00	0.00	0.00
32			0.00	0.00	0.00	0.00	0.00
33			0.00	0.00	0.00	0.00	0.00

	(b)(6); (b)(7(C)					
34		0.00	0.00	0.00	0.00	0.00
35		0.00	0.00	0.00	0.00	0.00
36		0.00	0.00	0.00	0.00	0.00
37		0.00	0.00	0.00	0.00	0.00
38		0.00	0.00	0.00	0.00	0.00
39		0.00	0.00	0.00	0.00	0.00
40		0.00	0.00	0.00	0.00	0.00
41		0.00	0.00	0.00	0.00	0.00
42		0.00	0.00	0.00	0.00	0.00
43		0.00	0.00	0.00	0.00	0.00
44		0.00	0.00	0.00	0.00	0.00
45		0.00	0.00	0.00	0.00	0.00
46		0.00	0.00	0.00	0.00	0.00
47		5203.79	0.00	0.00	0.00	200.00
48		0.00	0.00	0.00	0.00	0.00
49		0.00	0.00	0.00	0.00	0.00
50		0.00	0.00	0.00	0.00	0.00
51		0.00	0.00	0.00	0.00	0.00
52		0.00	0.00	0.00	0.00	0.00
53		0.00	0.00	0.00	0.00	0.00
54		0.00	0.00	0.00	0.00	0.00
55		0.00	0.00	0.00	0.00	0.00
56		0.00	0.00	0.00	0.00	0.00
57		0.00	0.00	0.00	0.00	0.00
58		0.00	0.00	0.00	0.00	0.00
59		0.00	0.00	0.00	0.00	0.00
60		0.00	0.00	0.00	0.00	0.00
61		0.00	0.00	0.00	0.00	0.00
62		0.00	0.00	0.00	0.00	0.00
63		0.00	0.00	0.00	0.00	0.00
64		0.00	0.00	0.00	0.00	0.00
65		0.00	0.00	0.00	0.00	0.00
66		0.00	0.00	0.00	0.00	0.00
67		0.00	0.00	0.00	0.00	0.00
68		0.00	0.00	0.00	0.00	0.00
69		0.00	0.00	0.00	0.00	0.00
70		0.00	0.00	0.00	0.00	0.00
71		0.00	0.00	0.00	0.00	0.00
72		2538.00	0.00	0.00	0.00	0.00
73		0.00	0.00	0.00	0.00	0.00
74		3145.33	0.00	0.00	0.00	0.00
75		0.00	0.00	0.00	0.00	0.00
76		0.00	0.00	0.00	0.00	0.00
77		0.00	0.00	0.00	0.00	0.00

(b)(6); (b)(7(C)

78	0.00	0.00	0.00	0.00	0.00
79	4300.00	0.00	0.00	0.00	0.00
80	0.00	0.00	0.00	0.00	0.00
81	0.00	0.00	0.00	0.00	0.00
82	0.00	0.00	0.00	0.00	0.00
83	0.00	0.00	0.00	0.00	0.00
84	0.00	0.00	0.00	0.00	0.00
85	0.00	0.00	0.00	0.00	0.00
86	0.00	0.00	0.00	0.00	0.00
87	0.00	0.00	0.00	0.00	0.00
88	0.00	0.00	0.00	0.00	0.00
89	0.00	0.00	0.00	0.00	0.00
90	0.00	0.00	0.00	0.00	0.00
91	0.00	0.00	0.00	0.00	0.00
92	0.00	0.00	0.00	0.00	0.00
93	0.00	0.00	0.00	0.00	0.00
94	0.00	0.00	0.00	0.00	0.00
95	0.00	0.00	0.00	0.00	0.00
96	0.00	0.00	0.00	0.00	0.00
97	5550.00	0.00	0.00	0.00	0.00
98	0.00	0.00	0.00	0.00	0.00
99	0.00	0.00	0.00	0.00	0.00
100	0.00	0.00	0.00	0.00	0.00
101	0.00	0.00	0.00	0.00	0.00
102	0.00	0.00	0.00	0.00	0.00
103	0.00	0.00	0.00	0.00	0.00
104	0.00	0.00	0.00	0.00	0.00
105	0.00	0.00	0.00	0.00	0.00
106	694.00	0.00	0.00	0.00	0.00
107	0.00	0.00	0.00	0.00	0.00
108	0.00	0.00	0.00	0.00	0.00
109	0.00	0.00	0.00	0.00	0.00
110	0.00	0.00	0.00	0.00	0.00
111	0.00	0.00	0.00	0.00	0.00
112	0.00	0.00	0.00	0.00	0.00
113	3250.00	0.00	0.00	0.00	0.00
114	0.00	0.00	0.00	0.00	0.00
115	4163.00	0.00	0.00	0.00	0.00
116	0.00	0.00	0.00	0.00	0.00
117	0.00	0.00	0.00	0.00	0.00
118	0.00	0.00	0.00	0.00	0.00
119	0.00	0.00	0.00	0.00	0.00
120	0.00	0.00	0.00	0.00	0.00
121	0.00	0.00	0.00	0.00	0.00

(b)(6); (b)(7(C)

122	0.00	0.00	0.00	0.00	0.00
123	0.00	0.00	0.00	0.00	0.00
124	0.00	0.00	0.00	0.00	0.00
125	0.00	0.00	0.00	0.00	0.00
126	0.00	0.00	0.00	0.00	0.00
127	0.00	0.00	0.00	0.00	0.00
128	0.00	0.00	0.00	0.00	0.00
129	0.00	0.00	0.00	0.00	0.00
130	0.00	0.00	0.00	0.00	0.00
131	0.00	0.00	0.00	0.00	0.00
132	0.00	0.00	0.00	0.00	0.00
133	0.00	0.00	0.00	0.00	0.00
134	0.00	0.00	0.00	0.00	0.00
135	0.00	0.00	0.00	0.00	0.00
136	8325.00	0.00	0.00	0.00	300.00
137	0.00	0.00	0.00	0.00	0.00
138	3469.00	0.00	0.00	0.00	0.00
139	4550.00	0.00	0.00	0.00	0.00
140	0.00	0.00	0.00	0.00	0.00
141	0.00	0.00	0.00	0.00	0.00
142	0.00	0.00	0.00	0.00	0.00
143	0.00	0.00	0.00	0.00	0.00
144	0.00	0.00	0.00	0.00	0.00
145	0.00	0.00	0.00	0.00	0.00
146	0.00	0.00	0.00	0.00	0.00
147	0.00	0.00	0.00	0.00	0.00
148	0.00	0.00	0.00	0.00	0.00
149	0.00	0.00	0.00	0.00	0.00
150	0.00	0.00	0.00	0.00	0.00
151	0.00	0.00	0.00	0.00	0.00
152	0.00	0.00	0.00	0.00	0.00
153	0.00	0.00	0.00	0.00	0.00
154	0.00	0.00	0.00	0.00	0.00
155	0.00	0.00	0.00	0.00	0.00
156	0.00	0.00	0.00	0.00	0.00
157	0.00	0.00	0.00	0.00	0.00
158	0.00	0.00	0.00	0.00	0.00
159	0.00	0.00	0.00	0.00	0.00
160	0.00	0.00	0.00	0.00	0.00
161.	0.00	0.00	0.00	0.00	0.00
162	0.00	0.00	0.00	0.00	0.00
163	0.00	0.00	0.00	0.00	0.00
164	0.00	0.00	0.00	0.00	0.00
165	0.00	0.00	0.00	0.00	0.00

	(b)(6); (b)(7(C)					
166		0.00	0.00	0.00	0.00	0.00
167		0.00	0.00	0.00	0.00	0.00
168		0.00	0.00	0.00	0.00	0.00
169		694.00	0.00	0.00	0.00	0.00
170		0.00	0.00	0.00	0.00	0.00
171		0.00	0.00	0.00	0.00	0.00
172		0.00	0.00	0.00	0.00	0.00
173		0.00	0.00	0.00	0.00	0.00
174		0.00	0.00	0.00	0.00	0.00
175		0.00	0.00	0.00	0.00	0.00
176		0.00	0.00	0.00	0.00	0.00
177		0.00	0.00	0.00	0.00	0.00
178		0.00	0.00	0.00	0.00	0.00
179		0.00	0.00	0.00	0.00	0.00
180		0.00	0.00	0.00	0.00	0.00
181		0.00	0.00	0.00	0.00	0.00
182		0.00	0.00	0.00	0.00	0.00
183		0.00	0.00	0.00	0.00	0.00
184		0.00	0.00	0.00	0.00	0.00
185		0.00	0.00	0.00	0.00	0.00
186		0.00	0.00	0.00	0.00	0.00
187		0.00	0.00	0.00	0.00	0.00
188		0.00	0.00	0.00	0.00	0.00
189		0.00	0.00	0.00	0.00	0.00
190		0.00	0.00	0.00	0.00	0.00
191		0.00	0.00	0.00	0.00	0.00
192		0.00	0.00	0.00	0.00	0.00
193		0.00	0.00	0.00	0.00	0.00
194		0.00	0.00	0.00	0.00	0.00
195		694.00	0.00	0.00	0.00	0.00
196		0.00	0.00	0.00	0.00	0.00
197		0.00	0.00	0.00	0.00	0.00
198		0.00	0.00	0.00	0.00	0.00
199		0.00	0.00	0.00	0.00	0.00
200		0.00	0.00	0.00	0.00	0.00
201		0.00	0.00	0.00	0.00	0.00
202		0.00	0.00	0.00	0.00	0.00
203		0.00	0.00	0.00	0.00	0.00
204		0.00	0.00	0.00	0.00	0.00
205		0.00	0.00	0.00	0.00	0.00
206		0.00	0.00	0.00	0.00	0.00
207		0.00	0.00	0.00	0.00	0.00
208		0.00	0.00	0.00	0.00	0.00
209		0.00	0.00	0.00	0.00	0.00

(b)(6); (b)(7(C)

210		0.00	0.00	0.00	0.00	0.00
211		0.00	0.00	0.00	0.00	0.00
212		0.00	0.00	0.00	0.00	0.00
213		0.00	0.00	0.00	0.00	0.00
214		0.00	0.00	0.00	0.00	0.00
215		0.00	0.00	0.00	0.00	0.00
216		0.00	0.00	0.00	0.00	0.00
217		0.00	0.00	0.00	0.00	0.00
218		0.00	0.00	0.00	0.00	0.00
219		2775.00	0.00	0.00	0.00	0.00
220		0.00	0.00	0.00	0.00	0.00
221		0.00	0.00	0.00	0.00	0.00
222		0.00	0.00	0.00	0.00	0.00
223		2775.00	0.00	0.00	0.00	0.00
224		0.00	0.00	0.00	0.00	0.00
225		0.00	0.00	0.00	0.00	0.00
226		0.00	0.00	0.00	0.00	0.00
227		0.00	0.00	0.00	0.00	0.00
228		0.00	0.00	0.00	0.00	0.00
229		0.00	0.00	0.00	0.00	0.00
230		0.00	0.00	0.00	0.00	0.00
231		0.00	0.00	0.00	0.00	0.00
232		0.00	0.00	0.00	0.00	0.00
233		0.00	0.00	0.00	0.00	0.00
234		0.00	0.00	0.00	0.00	0.00
235		0.00	0.00	0.00	0.00	0.00
236		0.00	0.00	0.00	0.00	0.00
237		0.00	0.00	0.00	0.00	0.00
238		0.00	0.00	0.00	0.00	0.00
239		0.00	0.00	0.00	0.00	0.00
240		0.00	0.00	0.00	0.00	0.00
241		0.00	0.00	0.00	0.00	0.00
242		0.00	0.00	0.00	0.00	0.00
243		0.00	0.00	0.00	0.00	0.00
244		0.00	0.00	0.00	0.00	0.00
245		0.00	0.00	0.00	0.00	0.00
246		0.00	0.00	0.00	0.00	0.00
247		4857.00	0.00	0.00	0.00	0.00
248		0.00	0.00	0.00	0.00	0.00
249		0.00	0.00	0.00	0.00	0.00
250		0.00	0.00	0.00	0.00	0.00
251		0.00	0.00	0.00	0.00	0.00
252		0.00	0.00	0.00	0.00	0.00
253		0.00	0.00	0.00	0.00	0.00

	(b)(6); (b)(7(C)					
254		0.00	0.00	0.00	0.00	0.00
255		0.00	0.00	0.00	0.00	0.00
256		0.00	0.00	0.00	0.00	0.00
257		0.00	0.00	0.00	0.00	0.00
258		3023.76	0.00	0.00	0.00	0.00
259		0.00	0.00	0.00	0.00	0.00
260		5550.00	0.00	0.00	0.00	0.00
261		0.00	0.00	0.00	0.00	0.00
262		1698.24	0.00	0.00	0.00	0.00
263		0.00	0.00	0.00	0.00	0.00
264		0.00	0.00	0.00	0.00	0.00
265		0.00	0.00	0.00	0.00	0.00
266		0.00	0.00	0.00	0.00	0.00
267		0.00	0.00	0.00	0.00	0.00
268		0.00	0.00	0.00	0.00	0.00
269		0.00	0.00	0.00	0.00	0.00
270		0.00	0.00	0.00	0.00	0.00
271		0.00	0.00	0.00	0.00	0.00
272		694.00	0.00	0.00	0.00	0.00
273		0.00	0.00	0.00	0.00	0.00
274		0.00	0.00	0.00	0.00	0.00
275		1114.19	0.00	0.00	0.00	0.00
276		0.00	0.00	0.00	0.00	0.00
277		0.00	0.00	0.00	0.00	0.00
278		0.00	0.00	0.00	0.00	0.00
279		0.00	0.00	0.00	0.00	0.00
280		0.00	0.00	0.00	0.00	0.00
281		0.00	0.00	0.00	0.00	0.00
282		0.00	0.00	0.00	0.00	0.00
283		4857.00	0.00	0.00	0.00	0.00
284		0.00	0.00	0.00	0.00	0.00
285		0.00	0.00	0.00	0.00	0.00
286		0.00	0.00	0.00	0.00	0.00
287		0.00	0.00	0.00	0.00	0.00
288		0.00	0.00	0.00	0.00	0.00
289		0.00	0.00	0.00	0.00	0.00
290		0.00	0.00	0.00	0.00	0.00
291		1158.91	0.00	0.00	0.00	0.00
292		1159.89	0.00	0.00	0.00	0.00
293		694.00	0.00	0.00	0.00	0.00
294		0.00	0.00	0.00	0.00	0.00
295		0.00	0.00	0.00	0.00	0.00
296		0.00	0.00	0.00	0.00	0.00
297		0.00	0.00	0.00	0.00	0.00

(b)(6); (b)(7(C)

298		0.00	0.00	0.00	0.00	0.00
299		0.00	0.00	0.00	0.00	0.00
300		0.00	0.00	0.00	0.00	0.00
301		0.00	0.00	0.00	0.00	0.00
302		0.00	0.00	0.00	0.00	0.00
303		0.00	0.00	0.00	0.00	0.00
304		0.00	0.00	0.00	0.00	0.00

S.A.P.
Liability Projection

	Pell	Unsub Loan	Sub Loan	Perkins	FSEOG
Total Liability in Sample	$83,871.11	$0.00	$0.00	$0.00	$500.00
Number of Students in Population	1464	1464	1464	1464	1464
Number of Students in Sample	304	304	304	304	304
Average Liability Per Student in Sample	$275.89	$0.00	$0.00	$0.00	$1.64
UCL:	$557,124.03	$0.00	$0.00	$0.00	$5,425.72
Projected Liability	$403,902.96	$0.00	$0.00	$0.00	$2,400.96
LCL:	$250,681.89	$0.00	$0.00	$0.00	($623.80)
UCL:	10.2%	0.0%	0.0%	0.0%	0.7%
Projected Fatal Error Rate	9.2%	0.0%	0.0%	0.0%	0.7%
LCL:	8.3%	0.0%	0.0%	0.0%	0.6%
Standard Deviation	1045.922948	0.000000	0.000000	0.000000	20.647732
Plus/Minus for UCL/LCL	153221.07	0.00	0.00	0.00	3024.76
Records	304	304	304	304	304

Statistical Sample Projection Matrix - Single Finding

Institution: **P.C.C.** **Appendix D** **2011-2012**

Population Size	1396
Statistical Sample Size	301

Finding 1: SAP

Liability Projection Worksheet

	Year	Name:	SSN:	Pell	Unsub Loan	Sub Loan	Perkins	FSEOG	FWS
1	2012	(b)(6); (b)(7(C)		0.00	0.00	0.00	0.00	0.00	0.00
2	2012			0.00	0.00	0.00	0.00	0.00	0.00
3	2012			0.00	0.00	0.00	0.00	0.00	0.00
4	2012			0.00	0.00	0.00	0.00	0.00	0.00
5	2012			0.00	0.00	0.00	0.00	0.00	0.00
6	2012			0.00	0.00	0.00	0.00	0.00	0.00
7	2012			0.00	0.00	0.00	0.00	0.00	0.00
8	2012			2775.00	0.00	0.00	0.00	0.00	0.00
9	2012			0.00	0.00	0.00	0.00	0.00	0.00
10	2012			4857.00	0.00	0.00	0.00	200.00	0.00
11	2012			0.00	0.00	0.00	0.00	0.00	0.00
12	2012			0.00	0.00	0.00	0.00	0.00	0.00
13	2012			0.00	0.00	0.00	0.00	0.00	0.00
14	2012			0.00	0.00	0.00	0.00	0.00	0.00
15	2012			0.00	0.00	0.00	0.00	0.00	0.00
16	2012			0.00	0.00	0.00	0.00	0.00	0.00
17	2012			446.40	0.00	0.00	0.00	0.00	0.00
18	2012			0.00	0.00	0.00	0.00	0.00	0.00
19	2012			0.00	0.00	0.00	0.00	0.00	0.00
20	2012			0.00	0.00	0.00	0.00	0.00	0.00
21	2012			0.00	0.00	0.00	0.00	0.00	0.00
22	2012			0.00	0.00	0.00	0.00	0.00	0.00
23	2012			0.00	0.00	0.00	0.00	0.00	0.00
24	2012			0.00	0.00	0.00	0.00	0.00	0.00
25	2012			1621.90	0.00	0.00	0.00	0.00	0.00
26	2012			0.00	0.00	0.00	0.00	0.00	0.00
27	2012			0.00	0.00	0.00	0.00	0.00	0.00
28	2012			0.00	0.00	0.00	0.00	0.00	0.00
29	2012			0.00	0.00	0.00	0.00	0.00	0.00
30	2012			0.00	0.00	0.00	0.00	0.00	0.00
31	2012			0.00	0.00	0.00	0.00	0.00	0.00
32	2012			0.00	0.00	0.00	0.00	0.00	0.00
33	2012			0.00	0.00	0.00	0.00	0.00	0.00

34	2012	(b)(6); (b)(7(C)	0.00	0.00	0.00	0.00	0.00	0.00
35	2012		0.00	0.00	0.00	0.00	0.00	0.00
36	2012		0.00	0.00	0.00	0.00	0.00	0.00
37	2012		0.00	0.00	0.00	0.00	0.00	0.00
38	2012		2775.00	3000.00	2250.00	0.00	0.00	0.00
39	2012		0.00	0.00	0.00	0.00	0.00	0.00
40	2012		0.00	0.00	0.00	0.00	0.00	0.00
41	2012		0.00	0.00	0.00	0.00	0.00	0.00
42	2012		0.00	0.00	0.00	0.00	0.00	0.00
43	2012		0.00	0.00	0.00	0.00	0.00	0.00
44	2012		0.00	0.00	0.00	0.00	0.00	0.00
45	2012		0.00	0.00	0.00	0.00	0.00	0.00
46	2012		0.00	0.00	0.00	0.00	0.00	0.00
47	2012		0.00	0.00	0.00	0.00	0.00	0.00
48	2012		0.00	0.00	0.00	0.00	0.00	0.00
49	2012		0.00	0.00	0.00	0.00	0.00	0.00
50	2012		0.00	0.00	0.00	0.00	0.00	0.00
51	2012		0.00	0.00	0.00	0.00	0.00	0.00
52	2012		0.00	0.00	0.00	0.00	0.00	0.00
53	2012		2082.00	0.00	0.00	0.00	0.00	0.00
54	2012		0.00	0.00	0.00	0.00	0.00	0.00
55	2012		0.00	0.00	0.00	0.00	0.00	0.00
56	2012		0.00	0.00	0.00	0.00	0.00	0.00
57	2012		0.00	0.00	0.00	0.00	0.00	0.00
58	2012		0.00	0.00	0.00	0.00	0.00	0.00
59	2012		0.00	0.00	0.00	0.00	0.00	0.00
60	2012		0.00	0.00	0.00	0.00	0.00	0.00
61	2012		0.00	0.00	0.00	0.00	0.00	0.00
62	2012		0.00	0.00	0.00	0.00	0.00	0.00
63	2012		0.00	0.00	0.00	0.00	0.00	0.00
64	2012		0.00	0.00	0.00	0.00	0.00	0.00
65	2012		0.00	0.00	0.00	0.00	0.00	0.00
66	2012		0.00	0.00	0.00	0.00	0.00	0.00
67	2012		0.00	0.00	0.00	0.00	0.00	0.00
68	2012		0.00	0.00	0.00	0.00	0.00	0.00
69	2012		0.00	0.00	0.00	0.00	0.00	0.00
70	2012		0.00	0.00	0.00	0.00	0.00	0.00
71	2012		0.00	0.00	0.00	0.00	0.00	0.00
72	2012		2775.00	0.00	0.00	0.00	0.00	0.00
73	2012		0.00	0.00	0.00	0.00	0.00	0.00
74	2012		0.00	0.00	0.00	0.00	0.00	0.00
75	2012		0.00	0.00	0.00	0.00	0.00	0.00
76	2012		0.00	0.00	0.00	0.00	0.00	0.00
77	2012		0.00	0.00	0.00	0.00	0.00	0.00

78	2012	(b)(6); (b)(7(C)	0.00	0.00	0.00	0.00	0.00	0.00
79	2012		0.00	0.00	0.00	0.00	0.00	0.00
80	2012		0.00	0.00	0.00	0.00	0.00	0.00
81	2012		0.00	0.00	0.00	0.00	0.00	0.00
82	2012		0.00	0.00	0.00	0.00	0.00	0.00
83	2012		0.00	0.00	0.00	0.00	0.00	0.00
84	2012		0.00	0.00	0.00	0.00	0.00	0.00
85	2012		477.68	0.00	0.00	0.00	0.00	0.00
86	2012		0.00	0.00	0.00	0.00	0.00	0.00
87	2012		0.00	0.00	0.00	0.00	0.00	0.00
88	2012		0.00	0.00	0.00	0.00	0.00	0.00
89	2012		0.00	0.00	0.00	0.00	0.00	0.00
90	2012		0.00	0.00	0.00	0.00	0.00	0.00
91	2012		0.00	0.00	0.00	0.00	0.00	0.00
92	2012		0.00	0.00	0.00	0.00	0.00	0.00
93	2012		0.00	0.00	0.00	0.00	0.00	0.00
94	2012		0.00	0.00	0.00	0.00	0.00	0.00
95	2012		0.00	0.00	0.00	0.00	0.00	0.00
96	2012		0.00	0.00	0.00	0.00	0.00	0.00
97	2012		0.00	0.00	0.00	0.00	0.00	0.00
98	2012		0.00	0.00	0.00	0.00	0.00	0.00
99	2012		0.00	0.00	0.00	0.00	0.00	0.00
100	2012		0.00	0.00	0.00	0.00	0.00	0.00
101	2012		0.00	0.00	0.00	0.00	0.00	0.00
102	2012		0.00	0.00	0.00	0.00	0.00	0.00
103	2012		2082.00	0.00	0.00		0.00	0.00
104	2012		0.00	0.00	0.00	0.00	0.00	0.00
105	2012		0.00	0.00	0.00	0.00	0.00	0.00
106	2012		0.00	0.00	0.00	0.00	0.00	0.00
107	2012		0.00	0.00	0.00	0.00	0.00	0.00
108	2012		0.00	0.00	0.00	0.00	0.00	0.00
109	2012		0.00	0.00	0.00	0.00	0.00	0.00
110	2012		0.00	0.00	0.00	0.00	0.00	0.00
111	2012		0.00	0.00	0.00	0.00	0.00	0.00
112	2012		0.00	0.00	0.00	0.00	0.00	0.00
113	2012		0.00	0.00	0.00	0.00	0.00	0.00
114	2012		0.00	0.00	0.00	0.00	0.00	0.00
115	2012		0.00	0.00	0.00	0.00	0.00	0.00
116	2012		0.00	0.00	0.00	0.00	0.00	0.00
117	2012		0.00	0.00	0.00	0.00	0.00	0.00
118	2012		0.00	0.00	0.00	0.00	0.00	0.00
119	2012		0.00	0.00	0.00	0.00	0.00	0.00
120	2012		0.00	0.00	0.00	0.00	0.00	0.00
121	2012		0.00	0.00	0.00	0.00	0.00	0.00

122	2012	(b)(6); (b)(7(C)	0.00	0.00	0.00	0.00	0.00	0.00
123	2012		0.00	0.00	0.00	0.00	0.00	0.00
124	2012		0.00	0.00	0.00	0.00	0.00	0.00
125	2012		0.00	0.00	0.00	0.00	0.00	0.00
126	2012		0.00	0.00	0.00	0.00	0.00	0.00
127	2012		0.00	0.00	0.00	0.00	0.00	0.00
128	2012		0.00	0.00	0.00	0.00	0.00	0.00
129	2012		0.00	0.00	0.00	0.00	0.00	0.00
130	2012		0.00	0.00	0.00	0.00	0.00	0.00
131	2012		0.00	0.00	0.00	0.00	0.00	0.00
132	2012		0.00	0.00	0.00	0.00	0.00	0.00
133	2012		0.00	0.00	0.00	0.00	0.00	0.00
134	2012		0.00	0.00	0.00	0.00	0.00	0.00
135	2012		0.00	0.00	0.00	0.00	0.00	0.00
136	2012		0.00	0.00	0.00	0.00	0.00	0.00
137	2012		0.00	0.00	0.00	0.00	0.00	0.00
138	2012		438.00	0.00	0.00	0.00	0.00	0.00
139	2012		0.00	0.00	0.00	0.00	0.00	0.00
140	2012		0.00	0.00	0.00	0.00	0.00	0.00
141	2012		0.00	0.00	0.00	0.00	0.00	0.00
142	2012		5550.00	2700.00	4500.00	0.00	200.00	0.00
143	2012		0.00	0.00	0.00	0.00	0.00	0.00
144	2012		0.00	0.00	0.00	0.00	0.00	0.00
145	2012		0.00	0.00	0.00	0.00	0.00	0.00
146	2012		0.00	0.00	0.00	0.00	0.00	0.00
147	2012		0.00	0.00	0.00	0.00	0.00	0.00
148	2012		0.00	0.00	0.00	0.00	0.00	0.00
149	2012		0.00	0.00	0.00	0.00	0.00	0.00
150	2012		0.00	0.00	0.00	0.00	0.00	0.00
151	2012		0.00	0.00	0.00	0.00	0.00	0.00
152	2012		0.00	0.00	0.00	0.00	0.00	0.00
153	2012		0.00	0.00	0.00	0.00	0.00	0.00
154	2012		0.00	0.00	0.00	0.00	0.00	0.00
155	2012		0.00	0.00	0.00	0.00	0.00	0.00
156	2012		0.00	0.00	0.00	0.00	0.00	0.00
157	2012		0.00	0.00	0.00	0.00	0.00	0.00
158	2012		0.00	0.00	0.00	0.00	0.00	0.00
159	2012		0.00	0.00	0.00	0.00	0.00	0.00
160	2012		0.00	0.00	0.00	0.00	0.00	0.00
161	2012		0.00	0.00	0.00	0.00	0.00	0.00
162	2012		0.00	0.00	0.00	0.00	0.00	0.00
163	2012		0.00	0.00	0.00	0.00	0.00	0.00
164	2012		0.00	0.00	0.00	0.00	0.00	0.00
165	2012		0.00	0.00	0.00	0.00	0.00	0.00

166	201	(b)(6); (b)(7(C)	0.00	0.00	0.00	0.00	0.00	0.00
167	201		0.00	0.00	0.00	0.00	0.00	0.00
168	201		0.00	0.00	0.00	0.00	0.00	0.00
169	201		0.00	0.00	0.00	0.00	0.00	0.00
170	201		0.00	0.00	0.00	0.00	0.00	0.00
171	201		0.00	0.00	0.00	0.00	0.00	0.00
172	201		0.00	0.00	0.00	0.00	0.00	0.00
173	201		0.00	0.00	0.00	0.00	0.00	0.00
174	201		0.00	0.00	0.00	0.00	0.00	0.00
175	201		3300.00	0.00	0.00	0.00	0.00	0.00
176	201		0.00	0.00	0.00	0.00	0.00	0.00
177	201		0.00	0.00	0.00	0.00	0.00	0.00
178	201		0.00	0.00	0.00	0.00	0.00	0.00
179	201		0.00	0.00	0.00	0.00	0.00	0.00
180	201		0.00	0.00	0.00	0.00	0.00	0.00
181	201		0.00	0.00	0.00	0.00	0.00	0.00
182	201		0.00	0.00	0.00	0.00	0.00	0.00
183	201		0.00	0.00	0.00	0.00	0.00	0.00
184	201		0.00	0.00	0.00	0.00	0.00	0.00
185	201		1388.00	2500.00	2250.00	0.00	0.00	0.00
186	201		0.00	0.00	0.00	0.00	0.00	0.00
187	201		0.00	0.00	0.00	0.00	0.00	0.00
188	201		0.00	0.00	0.00	0.00	0.00	0.00
189	201		0.00	0.00	0.00	0.00	0.00	0.00
190	201		0.00	0.00	0.00	0.00	0.00	0.00
191	201		0.00	0.00	0.00	0.00	0.00	0.00
192	201		0.00	0.00	0.00	0.00	0.00	0.00
193	201		0.00	0.00	0.00	0.00	0.00	0.00
194	201		0.00	0.00	0.00	0.00	0.00	0.00
195	201		0.00	0.00	0.00	0.00	0.00	0.00
196	201		694.00	0.00	0.00	0.00	0.00	0.00
197	201		0.00	0.00	0.00	0.00	0.00	0.00
198	201		0.00	0.00	0.00	0.00	0.00	0.00
199	201		0.00	0.00	0.00	0.00	0.00	0.00
200	201		0.00	0.00	0.00	0.00	0.00	0.00
201	201		0.00	0.00	0.00	0.00	0.00	0.00
202	201		0.00	0.00	0.00	0.00	0.00	0.00
203	201		0.00	0.00	0.00	0.00	0.00	0.00
204	201		0.00	0.00	0.00	0.00	0.00	0.00
205	201		0.00	0.00	0.00	0.00	0.00	0.00
206	201		0.00	0.00	0.00	0.00	0.00	0.00
207	201		0.00	0.00	0.00	0.00	0.00	0.00
208	201		0.00	0.00	0.00	0.00	0.00	0.00
209	201		0.00	0.00	0.00	0.00	0.00	0.00

210	2012	(b)(6); (b)(7(C)	0.00	0.00	0.00	0.00	0.00	0.00
211	2012		0.00	0.00	0.00	0.00	0.00	0.00
212	2012		0.00	0.00	0.00	0.00	0.00	0.00
213	2012		0.00	0.00	0.00	0.00	0.00	0.00
214	2012		0.00	0.00	0.00	0.00	0.00	0.00
215	2012		0.00	0.00	0.00	0.00	0.00	0.00
216	2012		0.00	0.00	0.00	0.00	0.00	0.00
217	2012		0.00	0.00	0.00	0.00	0.00	0.00
218	2012		0.00	0.00	0.00	0.00	0.00	0.00
219	2012		0.00	0.00	0.00	0.00	0.00	0.00
220	2012		0.00	0.00	0.00	0.00	0.00	0.00
221	2012		0.00	0.00	0.00	0.00	0.00	0.00
222	2012		0.00	0.00	0.00	0.00	0.00	0.00
223	2012		0.00	1999.00	0.00	0.00	0.00	0.00
224	2012		0.00	0.00	0.00	0.00	0.00	0.00
225	2012		0.00	0.00	0.00	0.00	0.00	0.00
226	2012		0.00	0.00	0.00	0.00	0.00	0.00
227	2012		0.00	0.00	0.00	0.00	0.00	0.00
228	2012		0.00	0.00	0.00	0.00	0.00	0.00
229	2012		325.00	0.00	0.00	0.00	0.00	0.00
230	2012		0.00	0.00	0.00	0.00	0.00	0.00
231	2012		0.00	0.00	0.00	0.00	0.00	0.00
232	2012		0.00	0.00	0.00	0.00	0.00	0.00
233	2012		0.00	0.00	0.00	0.00	0.00	0.00
234	2012		0.00	0.00	0.00	0.00	0.00	0.00
235	2012		0.00	0.00	0.00	0.00	0.00	0.00
236	2012		0.00	0.00	0.00	0.00	0.00	0.00
237	2012		0.00	0.00	0.00	0.00	0.00	0.00
238	2012		0.00	0.00	0.00	0.00	0.00	0.00
239	2012		0.00	0.00	0.00	0.00	0.00	0.00
240	2012		0.00	0.00	0.00	0.00	0.00	0.00
241	2012		0.00	0.00	0.00	0.00	0.00	0.00
242	2012		0.00	0.00	0.00	0.00	0.00	0.00
243	2012		0.00	0.00	0.00	0.00	0.00	0.00
244	2012		0.00	0.00	0.00	0.00	0.00	0.00
245	2012		0.00	0.00	0.00	0.00	0.00	0.00
246	2012		0.00	0.00	0.00	0.00	0.00	0.00
247	2012		0.00	0.00	0.00	0.00	0.00	0.00
248	2012		2082.00	0.00	0.00	0.00	0.00	0.00
249	2012		0.00	0.00	0.00	0.00	0.00	0.00
250	2012		0.00	0.00	0.00	0.00	0.00	0.00
251	2012		0.00	0.00	0.00	0.00	0.00	0.00
252	2012		0.00	0.00	0.00	0.00	0.00	0.00
253	2012		0.00	0.00	0.00	0.00	0.00	0.00

254	2012	(b)(6); (b)(7(C)	0.00	0.00	0.00	0.00	0.00	0.00
255	2012		4900.00	0.00	0.00	0.00	0.00	0.00
256	2012		0.00	0.00	0.00	0.00	0.00	0.00
257	2012		0.00	0.00	0.00	0.00	0.00	0.00
258	2012		0.00	0.00	0.00	0.00	0.00	0.00
259	2012		1388.00	0.00	0.00	0.00	0.00	0.00
260	2012		0.00	0.00	0.00	0.00	0.00	0.00
261	2012		0.00	0.00	0.00	0.00	0.00	0.00
262	2012		0.00	0.00	0.00	0.00	0.00	0.00
263	2012		0.00	0.00	0.00	0.00	0.00	0.00
264	2012		0.00	0.00	0.00	0.00	0.00	0.00
265	2012		0.00	0.00	0.00	0.00	0.00	0.00
266	2012		0.00	0.00	0.00	0.00	0.00	0.00
267	2012		0.00	0.00	0.00	0.00	0.00	0.00
268	2012		0.00	0.00	0.00	0.00	0.00	0.00
269	2012		0.00	0.00	0.00	0.00	0.00	0.00
270	2012		0.00	0.00	0.00	0.00	0.00	0.00
271	2012		0.00	0.00	0.00	0.00	0.00	0.00
272	2012		0.00	0.00	0.00	0.00	0.00	0.00
273	2012		0.00	0.00	0.00	0.00	0.00	0.00
274	2012		2775.00	0.00	0.00	0.00	0.00	0.00
275	2012		0.00	0.00	0.00	0.00	0.00	0.00
276	2012		0.00	0.00	0.00	0.00	0.00	0.00
277	2012		0.00	0.00	0.00	0.00	0.00	0.00
278	2012		0.00	0.00	0.00	0.00	0.00	0.00
279	2012		0.00	0.00	0.00	0.00	0.00	0.00
280	2012		0.00	0.00	0.00	0.00	0.00	0.00
281	2012		0.00	0.00	0.00	0.00	0.00	0.00
282	2012		0.00	0.00	0.00	0.00	0.00	0.00
283	2012		0.00	0.00	0.00	0.00	0.00	0.00
284	2012		0.00	0.00	0.00	0.00	0.00	0.00
285	2012		0.00	0.00	0.00	0.00	0.00	0.00
286	2012		0.00	0.00	0.00	0.00	0.00	0.00
287	2012		0.00	0.00	0.00	0.00	0.00	0.00
288	2012		0.00	0.00	0.00	0.00	0.00	0.00
289	2012		0.00	0.00	0.00	0.00	0.00	0.00
290	2012		0.00	0.00	0.00	0.00	0.00	0.00
291	2012		0.00	0.00	0.00	0.00	0.00	0.00
292	2012		0.00	0.00	0.00	0.00	0.00	0.00
293	2012		0.00	0.00	0.00	0.00	0.00	0.00
294	2012		0.00	0.00	0.00	0.00	0.00	0.00
295	2012		0.00	0.00	0.00	0.00	0.00	0.00
296	2012		0.00	0.00	0.00	0.00	0.00	0.00
297	2012		0.00	0.00	0.00	0.00	0.00	0.00

298	2012	(b)(6); (b)(7(C)	0.00	0.00	0.00	0.00	0.00	0.00
299	2012		0.00	0.00	0.00	0.00	0.00	0.00
300	2012		0.00	0.00	0.00	0.00	0.00	0.00
301	2012		0.00	0.00	0.00	0.00	0.00	0.00

SAP
Liability Projection

	Pell	Unsub Loan	Sub Loan	Perkins	FSEOG	FWS
Total Liability in Sample	$42,731.98	$10,199.00	$9,000.00	$0.00	$400.00	$0.00
Number of Students in Population	1396	1396	1396	1396	1396	1396
Number of Students in Sample	301	301	301	301	301	301
Average Liability Per Student in Sample	$141.97	$33.88	$29.90	$0.00	$1.33	$0.00
UCL:	$291,791.73	$88,566.36	$85,987.80	$0.00	$4,129.99	$0.00
Projected Liability	$198,190.12	$47,296.48	$41,740.40	$0.00	$1,856.68	$0.00
LCL:	$104,588.51	$6,026.60	($2,507.00)	$0.00	($416.63)	$0.00
UCL:	7.0%	1.5%	1.1%	0.0%	0.7%	0.0%
Projected Fatal Error Rate	6.3%	1.3%	1.0%	0.0%	0.7%	0.0%
LCL:	5.6%	1.2%	0.9%	0.0%	0.6%	0.0%
Standard Deviation	670.132589	295.468108	316.785401	0.000000	16.275589	0.000000
Plus/Minus for UCL/LCL	93601.61	41269.88	44247.40	0.00	2273.31	0.00
Records	301	301	301	300	301	301

Estimated Loss Formula

Enter Institution Name P.C.C. Finding 1: S.A.P.

Select Institution Type Public 2 Yrs or Less

	Select Type of Loan	Select Award Year	Enter Ineligible Loan Amount	Enter School CDR	Total Subsidy Costs	Estimated Loss Liability
1	DL Subsidized	2011-2012	$ 41,740.00	11.93%	6.52%	$ 2,720.53
2	DL Unsubsidized	2011-2012	$ 47,296.00	11.93%	-24.89%	$ -
3						
	Description		$ 89,036.00			$ 2,720.53
4						
5						
6						
	Description		$ -			$ -
7						
8						
9						
	Description		$ -			$ -
10						
11						
12						
	Description		$ -			$ -
	Original Ineligible Loan Liability		$ 89,036.00	**Total Estimated Loss**		$ 2,720.53

Piedmont Community College
Appendix E - Estimated Loss Formula

To calculate estimated loss for a given ineligible loan amount, that amount is multiplied by the total subsidy rates calculated for the ineligible loans. Consolidation Loans will be obtained in the future to prepay some of the ineligible loans; the amount of Consolidation Loans divided by the ineligible Stafford/PLUS loans equals the "Consolidation prepayment rate" (H) for those loans.
The Department's Budget Office calculates, on an annual basis, the rate per dollar of loan of default subsidies (DSRs) and all other subsidies (OSRs) (D & F) for Stafford and PLUS Loans, by cohort year, program, loan type, and risk group (note that 2008-2010 FFEL loan costs are calculated only by cohort year).

	A	B	C	D	E	F	G	H	I	J
	School CDR	**Sector CDR***	**Ratio ****	***DSR* *****	**Adjusted DSR**	***OSR* *****	**Avg Cons Year**	**Cons Prepay %**	***Cons DSR* *****	***Cons OS* *****
1	11.93%	11.93%	1.00	*4.73%*	4.73%	*0.40%*	2020	21.1%	*3.27%*	*3.31%*
2	11.93%	11.93%	1.00	*5.93%*	5.93%	*-32.21%*	2021	23.7%	*3.29%*	*2.56%*
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										

Federal Student Aid (FSA) calculates the cohort default rates (CDRs) of the institution (A), and the average CDR for the sector for that institution (B). FSA applies the CDR comparison ratio (C), [A/B = C] against the Budget Office's cohort loan DSR (D) to determine the default subsidy rate for the institution (E). The Budget Office estimates the default subsidy rate and other subsidy rate for the Consolidation Loans that will prepay some of these Stafford and PLUS Loans (I & J).
The total subsidy rate for the ineligible Stafford and PLUS Loans is ((E+F) + ((I+J) x H)).
The total subsidy cost for these loans is the ineligible loan amount multiplied by the total subsidy rate.

Ineligible Disbursements (Non-Loan) - Cost of Funds and Administrative Cost Allowance

Name of Institution: **P.C.C. Appendix F**

No.	Description/Name	Ineligible Disbrsmnt	Program	Disbursement Date	Return Paid Date	No. of Days	Imputed CVFR	Federal Share	To ED	To Inst Accounts
	2010-2011	$403,902.96	Pell Grant	2/18/2011	9/12/2012	572	1.00%	$ 403,902.96	$ 6,330.29	$ -
	2010-2011	$2,400.96	FSEOG-No Match	2/18/2011	9/12/2012	572	1.00%	$ 2,400.96	$ 37.63	$ -
	2011-2012	$198,190.12	Pell Grant	2/17/2012	9/12/2012	208	1.00%	$ 198,190.12	$ 1,129.53	$ -
	2011-2012	$1,856.68	FSEOG-No Match	2/17/2012	9/12/2012	208	1.00%	$ 1,856.68	$ 10.58	$ -
[redacted]										

Total Ineligible	$606,350.72

	To ED	To Inst Accounts
Totals	$ 7,508.03	$ -
ACA Liability		

Campus-Based Amounts Spent (from FISAP, Part VI, Section B)

Federal FWS	
Federal SEOG	
Federal Perkins	
Total C-B Spent	$ -
ACA Percentage	

	Total	Federal Share
Pell	$ 602,093.08	$ 602,093.08
ACG	$ -	$ -
SMART	$ -	$ -
TEACH	$ -	$ -
FWS	$ -	$ -
FSEOG	$ -	$ -
Perkins	$ -	$ -
FWS-50% Match	$ -	$ -
FWS-No Match	$ -	$ -
FSEOG-No Match	$ 4,257.64	$ 4,257.64
Perkins-No Match	$ -	$ -
Total Campus-Based	$ 4,257.64	$ 4,257.64

Interest Breakdown

Pell Grants	$ 7,459.82	$ -
ACG	$ -	$ -
SMART	$ -	$ -
TEACH	$ -	$ -
FWS	$ -	$ -
FSEOG	$ -	$ -
Perkins	$ -	$ -
FWS-50% Match	$ -	$ -
FWS-No Match	$ -	$ -
FSEOG-No Match	$ 48.21	$ -
Perkins-No Match	$ -	$ -

ACA Breakdown

FWS	
FSEOG	
Perkins	
FWS-50% Match	
FWS-No Match	
FSEOG-No Match	
Perkins-No Match	